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January 11, 2023

BY ECF

Honorable Ronnie Abrams
United States Courthouse
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

**RE. *Gambaro v. 1917 ACP Owner LLC, et al,*
22cv7855 (RA) (OTW)**

Dear Judge Ronnie Abrams:

I represent the Plaintiffs and respectfully request an adjournment of the Rule 16 conference scheduled for January 13, 2023 and an entry of a briefing schedule related to the motion to dismiss Defendants intend to file. (Briefing schedule is annexed hereto as Exhibit 1). This is Plaintiffs' first request for an adjournment of this conference and the request does not affect any other deadlines in this matter. Defendants consent to the request.

Defendants have stated they intend to file a motion to dismiss the Second Amended Complaint. Therefore, since parties will not be commencing discovery, having a Rule 16 conference at this time would be premature and a waste of judicial resources.

Thank you very much for your consideration.

Application granted. The initial status conference scheduled for January 13, 2023 is hereby adjourned, and the Court adopts the briefing schedule for the intended motion to dismiss as stipulated below.

Respectfully Submitted,

/s/ James E. Bahamonde

James E. Bahamonde, Esq.

SO ORDERED.



Hon. Ronnie Abrams
January 12, 2023

cc: (via ECF)
Michael Miranda, Esq.
Richard Epstein, Esq.
Attorneys for 1917 ACP Owner LLC
Miranda Slone Sklarin Verveniotes LLP